

Senior Executive Officer  
Planning Department,  
Fingal County Council,  
Main Street  
Swords  
Co. Dublin

Wednesday 11 May 2022

**Re: Submission in relation to the Draft Fingal County Development Plan 2023 - 2029**

Dear Sir/Madam,

## 1. INTRODUCTION / EXECUTIVE SUMMARY

Breengrove Limited<sup>1</sup> in conjunction with Ivan Hemeryck<sup>2</sup> and Grafton Group Plc<sup>3</sup> has retained Tom Phillips + Associates (Town Planning Consultants)<sup>4</sup>, to prepare this Submission in relation to the Draft Fingal County Development Plan 2023 – 2029, currently out for public consultation. The submission relates to lands in North Lucan (Figure 1). The submission has been prepared on behalf of a number of land owners.

The current submission relates to lands in North Lucan, adjacent to the Laraghcon Residential development and bounded by the River Liffey to the southeast and Royal Canal to the north west.

Following detailed review, our clients consider that an updated policy context in this area is required, not least to assist with delivering the Council's amenity objectives for the wider area but also to recognise and make provision for existing land uses and to resolve identified traffic and movement issues within the town of Lucan and the North Lucan area. The targeted interventions as outlined in this submission have the potential to deliver wider benefits for the Lucan area and to create synergies between the aims of both Fingal and South Dublin County Councils.

---

<sup>1</sup> 59 St Assam's Park, Raheny, Dublin 5, Ireland

<sup>2</sup> Kerbia, Laraghon Farm, Lucan, Co. Dublin

<sup>3</sup> Heron House, Corrig Rd, Sandyford, Co. Dublin

<sup>4</sup> 80 Harcourt Street, Dublin 2, D02 F449.



Figure 1 – Approximate Site Location (red outline). Source: Google Earth annotated by TPA

These lands are currently designated as High Amenity in both the existing and Draft County Development Plans. However, the range of uses within the subject lands (Figure 2), ranging from agriculture to light Industrial, are not reflective of the planning policies pertaining to them in the Development Plan. The High Amenity zoning objective seeks to increase public access for amenity purposes. However, these lands are not currently accessible to the public as a public amenity resource and are poorly integrated with adjoining areas and associated green infrastructural policies as outlined in both the existing and draft Development Plans

The purpose of the submission is to highlight the opportunity that exists to enhance the development of this area of south Fingal, through consolidation of existing employment lands, enhanced connectivity and a coherent approach towards delivery of green infrastructure and amenity objectives. We consider that the current policy approach, which has been largely replicated in the Draft Development Plan, is not sufficiently targeted to ensure the sustainable development of this area.

Our clients are coordinating this submission on behalf of the various land owners that comprise the subject area (Figure 1). The owners are in agreement that the area possesses a significant amount of potential in terms improving area wide connectivity, unlocking the tourism and amenity potential of the adjacent Shackleton (Anna Liffey) Mills and enabling the creation of usable, high quality amenity spaces that will link with nearby existing and planned green infrastructure such as the Royal Canal Way and the Liffey Special Amenity Area.

Our clients are requesting that the Local Authority consider introducing, a more nuanced and strategic approach to policy formation in this area, which would in our view lead to the achievement of a number of key shared objectives of both Fingal and South Dublin County Councils.

Firstly, we are requesting that an existing portion of the subject lands to the south, currently occupied by commercial and other employment uses (Figure 2) be assigned an appropriate



zoning objective, such as General Employment use. This would allow for the consolidation of the long standing existing commercial and employment uses in this area and ensure that these uses can continue to develop in a sustainable manner with the necessary planning policy support.

Secondly, our clients are requesting the inclusion of a connectivity and movement objective in the upcoming Development Plan, the details of which are outlined in this submission. The potential connectivity improvements are also illustrated in the accompanying documentation provided by POGA Consulting Engineers. As the Planning Authority are aware, the existing bridge at Lucan is heavily trafficked and often subject to significant congestion. The clients have engaged MHL consulting Engineers who have carried out a baseline analysis of the existing traffic and travel context in and around this area. This report considers the existing roads and traffic situation in light of existing and future development plans.

As part of the traffic assessment traffic modelling of critical junctions in Lucan Village were developed. This traffic modelling determined that a number of these junctions, including the roundabout to the south of the Lucan Bridge (circa 1814) and signalised junction to the north of the bridge are operating significantly over capacity, in the current year scenario. The assessment also determined that the Lucan Bridge is catering for an excessive volume of traffic, more appropriate to a dual carriageway type road. Traffic congestion resultant from the large traffic volumes were found to be very extensive, to the detriment of vulnerable road users such as pedestrians and cyclists and most particularly mobility impaired road users. The town centre also provides very poor quality of facilities for these users.

The level of traffic recorded at these junctions demonstrates that a supplemental crossing of the River Liffey is required which would allow for improved vehicle connectivity but also provide improved active travel connectivity to intended cycle and pedestrian infrastructure. The new road, referred to as the “North Lucan Link Road” in the MHL report, would also allow for the Lucan Village centre to be reimaged, with appropriate urban renewal measures and vulnerable road user facilities installed.

The proposals for a connectivity and movement objective therefore provides the opportunity for a future additional bridging point across the River Liffey, which would simultaneously create a link between green amenity corridors north and south of the river and provide much needed alleviation of traffic congestion at the main bridging point across the river in Lucan. This enhanced connectivity, which would incorporate pedestrian and cycle links, would provide benefits to the existing residential, commercial and employment areas in North Lucan. It also presents the opportunity to deliver pedestrian and cycle connectivity between planned cycle infrastructure in and around Lucan village to the South and Leixlip to the west. The additional connectivity proposed would enable a coordinated approach between the various Local Authorities in unlocking the potential of the Liffey Valley area and is not too dissimilar to the second river crossing being explored in Celbridge by Kildare County Council<sup>5</sup>.

Finally, our clients consider that with suitable policy support, the eastern portion of the subject lands have the potential to deliver a riverside green link as well as tourism, amenity &

---

<sup>5</sup> <https://consult.kildarecoco.ie/en/consultation/celbridge-hazelhatch-link-road-public-consultation-emerging-preferred-route>

leisure focused uses related to the nearby Shackleton Mills. In combination with the proposed transport objectives referred to above, the appropriate policy support can serve as a catalyst for the development of the adjacent Shackleton (Anna Liffey) Mills as a significant regional tourism amenity.



Figure 2 - Existing Land uses with the subject lands

## 2. SITE LOCATION AND DESCRIPTION

The subject lands are located in North Lucan, approximately 15 km west of Dublin City Centre and adjacent to the boundary of Fingal County Council and South Dublin County Council administrative areas. The lands are bounded to the south east by the River Liffey and by the Royal Canal to the north west. The lands are predominantly agricultural in nature and include a farm holding in the north western corner. A portion of the southern sections of the lands are dominated by existing light industrial and commercial uses. The north eastern corner of the land holding is adjoined by the Fort Lucan outdoor adventure centre.

Surrounding land uses include the Westmanstown Golf Club to the north, Marymount Care Centre to the north east, Laraghcon housing estate to the south west and several one off residential properties along the northern boundary of the lands.

The south eastern boundary of the lands follows the course of the River Liffey, marking the boundary with South Dublin County Council administrative area. The main Dublin – Sligo rail line runs adjacent to the north western boundary of the lands, where the now disused Lucan North Railway station is also located. The rail line also carries commuter services between Dublin Connolly and Leixlip, Maynooth and Mullingar. The historic Anna Liffey Weir and Shackleton’s Mill are located a short distance to the east of the site.



### 3. NATIONAL AND REGIONAL PLANNING POLICY

#### 3.1 Project Ireland 2040 - National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. It envisages growth of between 490,000 and 540,000 additional people in the Eastern and Midland Region over the next 20 years.

The plan includes numerous National Policy Objectives (NPOs), among them NPO 4 which seeks the creation of:

*attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*

and NPO 6 which seeks to:

*Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, **in order to sustainably influence and support their surrounding area.***

The NPF promotes a compact growth strategy that aims to maximise the potential of the country's existing urban assets.

#### 3.2 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was adopted on 28<sup>th</sup> June 2019. Among the 16 Regional Strategic outcomes included in the Strategy include:

##### ***Sustainable Settlement Patterns***

*Better manage the sustainable and compact growth of Dublin as a city of international scale*

##### ***Integrated Transport and Land Use***

*Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)*

The strategy identifies Lucan as a key town in terms of Enterprise Development and Innovation Assets.

*Key Towns, strong market/sub county towns are locations that have an economic function that provides employment for their surrounding areas and have a wide catchment. In many cases these areas have varying economies and sectors and the Strategy will support their sustainable growth*

At section 9.4 (Healthy Placemaking) of the RSES a number of 'Guiding Principles' for the creation of healthy and attractive places are set out including:

- *Public open spaces to have good connectivity and be accessible by safe, secure walking and cycling routes.*



- *Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure, and key landscape features in their design.*

Further to the above, the RSES at page 69, notes that focus on compact growth and increased densities in urban areas will require a greater alignment between the development of communities and the provision and planning of open space to provide for the recreational and amenity needs of communities. In this regard the RSES supports the preparation of open space and parks strategies by local authorities.

The RSES includes the following relevant policy objectives:

*RPO 9.14: Local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.*

*RPO 9.17: To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.*

#### **4. LOCAL PLANNING POLICY**

##### **4.1 Existing Fingal County Council Development Plan 2017 - 2023**

The subject lands are zoned as High Amenity in the current *Fingal County Council Development Plan 2017 – 2023* with the stated objective to:

*Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.*

The plan recognises the Tolka and Liffey valleys together with the Royal Canal Corridor as being the main landscape features in this area. In recognition of the special amenity value of this area a Special Amenity Area Order (SAAO) was made for the Liffey Valley between Lucan and Chapelizod in 1990. This designation includes specific controls over development. The subject site sits outside the SAAO. The River Liffey is also a proposed Natural Heritage Area (pNHA). Further to this, Objective NH23 seeks to:

*Protect the ecological functions and integrity of the corridors indicated on the Development Plan Green Infrastructure Maps.*

The subject lands incorporate a protected structure (RPS no. 946) Clanaboy House, described as a late 19th century detached four-bay two-storey house over raised basement. The structure is now in use as offices.

Site specific objective 162 (outlined in black dashed line in Figure 3) incorporates existing commercial / light industrial lands in the south east of the subject area. The objective seeks to

*carry out a study of these lands, where currently in industrial use, to identify the mix and scale of uses and access arrangements appropriate to this visually sensitive area and the Council's objectives for the Liffey Valley SAAO and environs and to provide for the long term relocation of existing non-conforming industrial uses in this area.*

We note that this objective includes a portion of the subject lands that are currently occupied by employment uses along the banks of the river Liffey. We consider that the Liffey Valley SAAO Objectives can be achieved in tandem with a consolidation of existing lands that are



currently in commercial / employment use, thereby providing a mixture of complimentary land uses in the area.

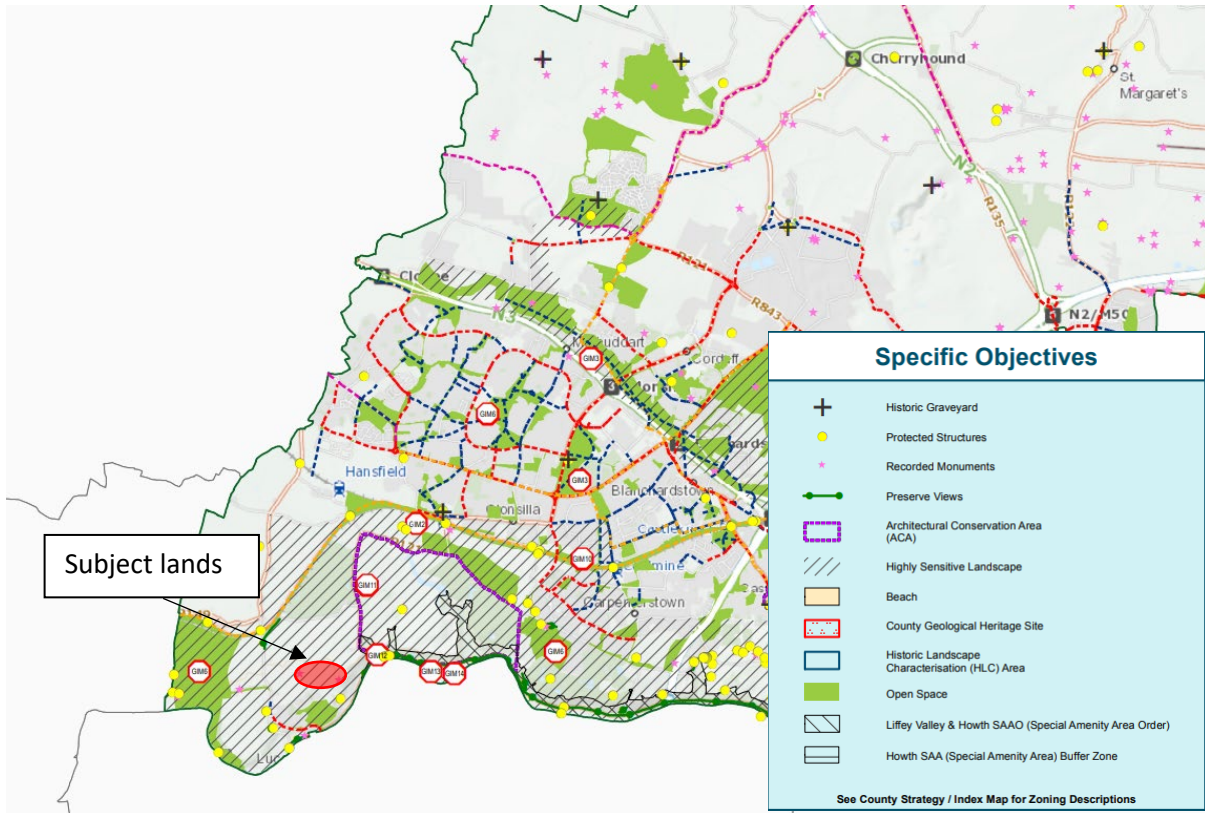


Figure 3 - Extract from Fingal County Development Plan 2017 - 2023 - Green Infrastructure Maps.



Figure 4 - Fingal County Council online planning map viewer with subject lands outlined approximately in red and showing Liffey Valley SAO to the east of the subject lands. Site Specific Objective 162 outlined in dashed black. (Annotated by TPA)



## 4.2 Draft Fingal County Council Development Plan 2023 - 2029

The *Draft Fingal County Council Development Plan 2023 – 2029* re-affirms many of the existing policies relating to the subject lands as contained in the existing Development Plan

With regard to the Special Amenity Area Order for Liffey Valley, we note the following:

*Policy GINHP27 – Howth and Liffey Valley Amenity Orders Protect and enhance the special amenity value of Howth and the Liffey Valley, including its landscape, visual, recreational, ecological, geological, and built heritage value, as a key element of the County's Green Infrastructure network and implement the provisions of the Howth and Liffey Valley Special Amenity Area Orders (SAAO)*

*Objective GINHO60 – SAAO Management Committees Re-establish in a timely manner the management committee for the Liffey Valley Special Amenity Area with an annual programme of quarterly meetings in partnership with South Dublin County Council on an ongoing basis, develop a five year works programme as part of the implementation plan for the SAAO and explore the possibility of extending the Liffey Valley Special Amenity Area north to the Westmanstown Road (R121), Porterstown Road, Carpenterstown Road and Tower Road.*

Further to the above, Objective GINHO62 seeks to carry out a study on the Liffey Valley SAAO as well as additional surrounding areas to determine the feasibility of developing a regional park.

*Objective GINHO62 Liffey Valley Regional Park Study To carry out a study for the lands that comprise Liffey Valley inclusive of the Special Area Amenity Order (SAAO), Shackletons Mill and adjacent lands so as to investigate and determine viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area, in accordance with the Council's published document Towards a Liffey Valley Park (2007). This new Regional Park will serve the needs of existing communities of Clonsilla, Hansfield and Ongar as well as the wider Greater Dublin area. The study will be carried out in consultation with the surrounding Local Authorities, State Agencies, existing landowners, sectoral, community and commercial interests.*

We further note Green infrastructure Objective GIM 10, adjacent to the subject lands, which seeks to:

*Develop Anna Liffey Mills as a significant public amenity within the Liffey Valley while protecting its architectural and industrial heritage values*

In addition to the above, map Based Local Objective no. 95 seeks to:

*Acquire and develop a suitable car parking site in the vicinity of Anna Liffey (Shackletons) Mills and upgrade the existing pedestrian/cycle path along the river bank westwards to connect with Lucan Village taking appropriate measures to ensure that the integrity of the Liffey Valley is fully taken account of in the layout, design and location of the car park and the upgrading of the pedestrian/cycle path.*

Chapter 6 of the Draft Plan addresses matters of connectivity and movement with section 6.3 identifying the:



*opportunity to interconnect many our climate-based objectives such as nature-based solutions with travel networks to help deliver a range of environmental and public realm benefits.*

Policy CMP3 Integrated Land-Use and Transport Approach provides for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.

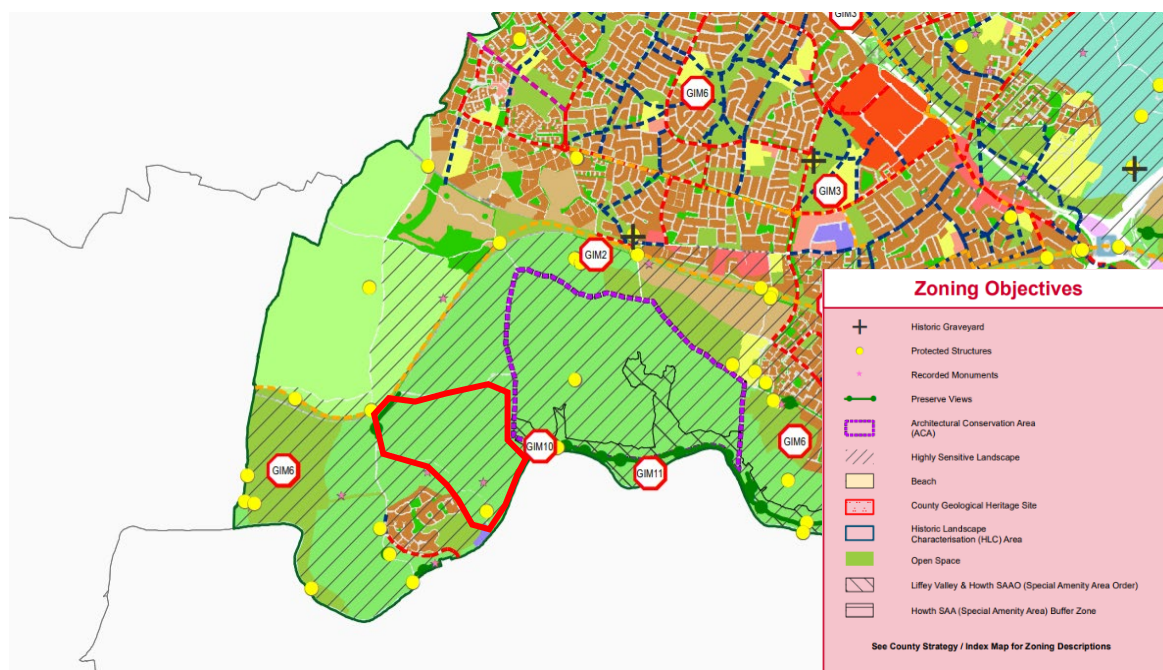


Figure 5 - Excerpt from Green Infrastructure Map 1 - Draft Fingal County Council Development Plan 2023 – 2029 (Subject lands outlined in red)

Objective CMO12 seeks to support the

*the formulation and delivery of an integrated pedestrian/cycle network plans which connect adjacent communities providing linkages to all modes of transport which will provide links to all destinations of the County creating the nucleus of a slow tourist trail*

In terms of Road infrastructure the Draft Plan includes Policy CMP30 which seeks to:

*Prioritise new road developments that facilitate improvements in the overall efficiency of the transportation network including through the provision of new bridge crossings or new cycling and walking infrastructure.*

#### **4.3 Draft South Dublin County Council Development Plan 2022 – 2028**

The preparation of the South Dublin County Council (SDCC) Development Plan is currently at an advanced stage and The Elected Members are due to make the final plan at one or more Special Council Meetings, the last to be held no later than 1st July 2022. The Development Plan will come into effect 6 weeks after the last meeting.

The Plan includes objectives for the North Lucan area that are relevant to both SDCC and Fingal County Councils, including NCBH7 SLO 1 which seeks to



*To investigate the potential of collaborating with Fingal County Council for the re-use of Shackleton's Mill as a tourism destination given its location in proximity to Lucan Village.*

Objective NCBH7 Objective 4 outlines the Council's objectives for the Liffey valley in a broader sense, as being to:

*facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAAO by:*

- *Carrying out a study of the lands that comprise Liffey Valley inclusive of the Special Amenity Area Order (SAAO) and adjacent lands;*
- *Investigating and determining, as part of the study, viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network;*
- *Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with 'Towards a Liffey Valley Park' (2007) or any superseding plan, including potential permissive access routes*

#### **4.4 Greater Dublin area Cycle Network Plan**

The Plan provides for a greenway along the course of the River Liffey with proposed bridging points near Shackleton Mills and the existing Lucan Bridge. A number of primary and secondary routes are proposed for Lucan Village, as well as an additional greenway connecting south towards Sallins and Naas. An additional greenway is proposed to the south west of the subject lands, linking the Laraghcon Estate with Leixlip to the west (Figure 6).

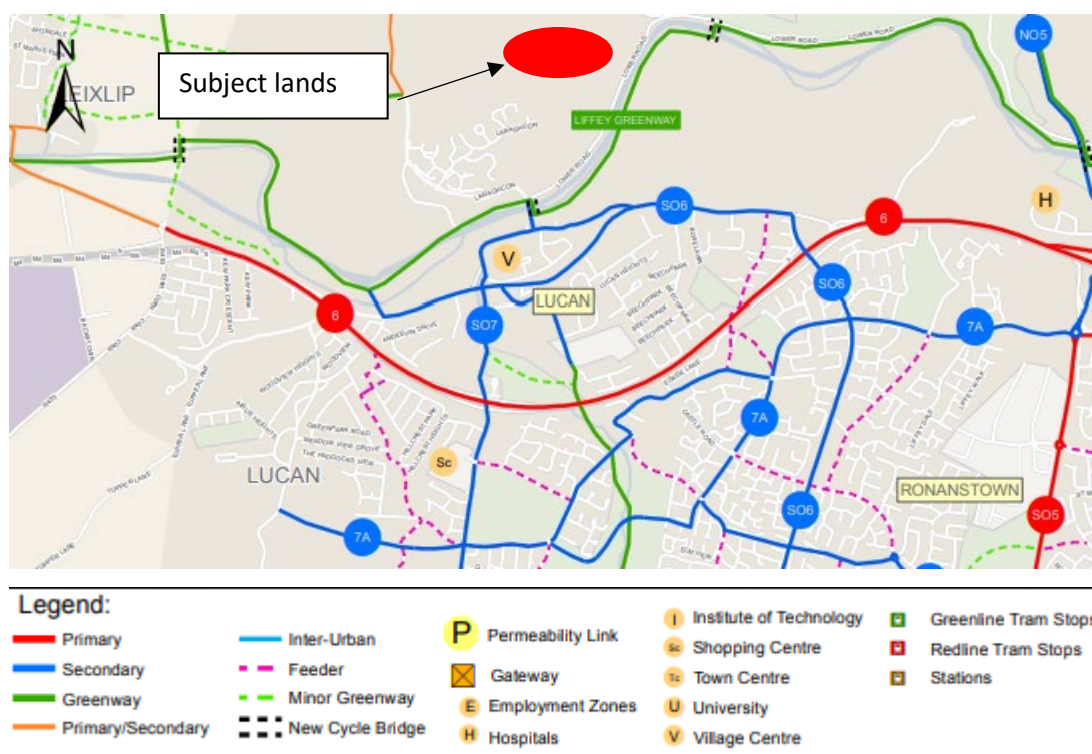


Figure 6 - Excerpt from Greater Dublin Metropolitan Cycling Plan Maps.

#### 4.5 Towards a Liffey Valley Park (2007)

The vision of the 2007 strategy is to provide a series of public parks and adjacent land uses along the river collectively form the River Valley Park in which there are considerable opportunities for recreation, tourism, economic development and habitat creation. This strategy aims to present a holistic vision for development and promotion of the Liffey Valley Park and to help guide the administration, management and allocation of resources of the Office of Public Works and the four Local Authorities in whom the future of the Liffey Valley is entrusted.

The Vision is founded on the following seven core objectives:

1. Establish a launch programme for the strategy centred on the delivery of the flagship projects; Bring planning and related policy together for the purpose of directing the development and management of the Liffey Valley;
2. Engage the local and wider community and promote the Liffey Valley as a site for recreation, education and for the enjoyment of the environment for all;
3. Support sustainable economic activity and development that is sympathetic to the character of the Liffey Valley, maintains viable communities and encourages the use of the river valleys assets for tourism and recreation;
4. Ensure the River is accessible through the public parks and spaces along the maximum extent of the Liffey Valley Park;

5. Protect, conserve and enhance the natural resources of the Liffey Valley in the interests of maintaining a diverse biodiversity and for the benefit of future generations;
6. and Ensure the preservation, enhancement and continued use of the Liffey Valley's cultural heritage assets.

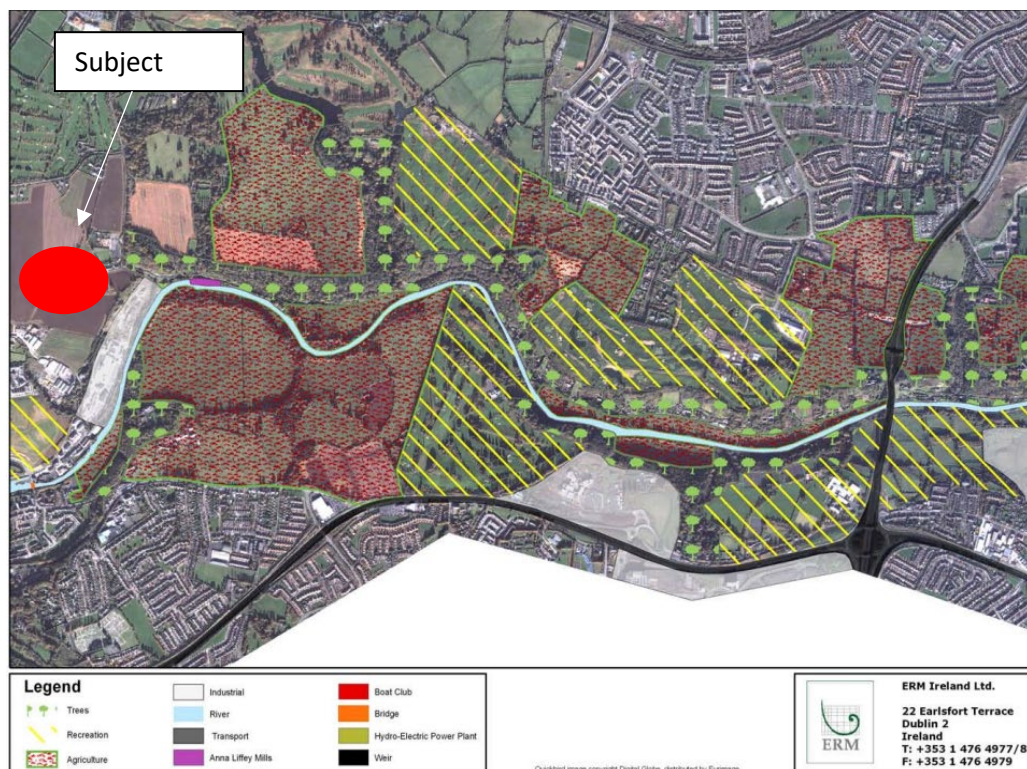


Figure 7 - Land use Map 4C from Towards a Liffey Valley Park Strategy with subject lands highlighted in red.

## 5. SUBMISSION REQUEST

This submission is seeking a more targeted approach to Development Plan policy in the North Lucan Area. We consider the policy regime applied to the area, in both the existing Development Plan and the Draft Development Plan is non-specific and does not reflect the reality of existing land use in the area, nor has it delivered on the long held amenity objectives for the wider area including the Liffey SAO.

We are proposing that the following provisions in relation to North Lucan be included in the upcoming Draft Fingal County Development Plan 2023 - 2029

1. Revised land use zoning of Southern portion of lands to General Employment (Figure 8).
2. An additional proposed Connectivity and Movement Objective (wording below and mapped in Figure 9)

### Objective CMO37d

To support the planning and delivery of enhanced road connectivity, including pedestrian and cycling links, at Lucan North in conjunction with South Dublin County Council and Kildare County Council



3. The following map based Local Objective (wording below and mapped in Figure 9)

**100 - Provide for a strategic vehicular/pedestrian/cycle link across the River Liffey from the Old Lucan Road (R835), Lucan via a new bridge to Laraghcon, North.**

4. A revision and update to existing Green infrastructure objective GIM 10 (Figure 8) to provide for more targeted and support for the development of Anna Liffey Mills and surrounding area. See proposed wording below with our additions emphasised in bold text:

*Develop Anna Liffey Mills **and surrounding high amenity lands** as a significant public amenity within the Liffey Valley while protecting its architectural and industrial heritage values. **Complimentary amenity & leisure focused uses such as interactive hub, café, restaurant, tourism amenity etc. shall be supported.***

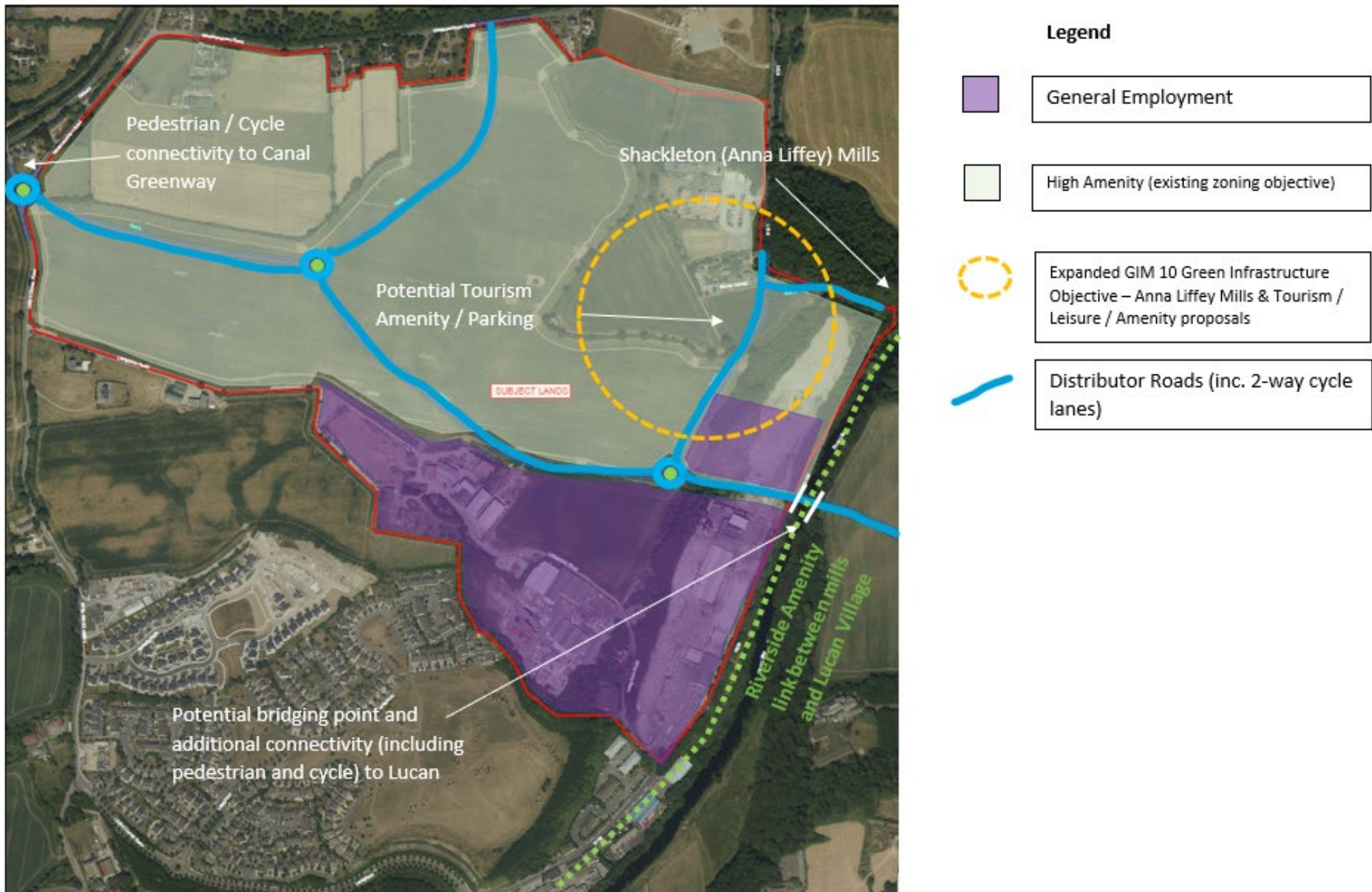


Figure 8 - Proposed Land Use Zoning objectives and high level proposals

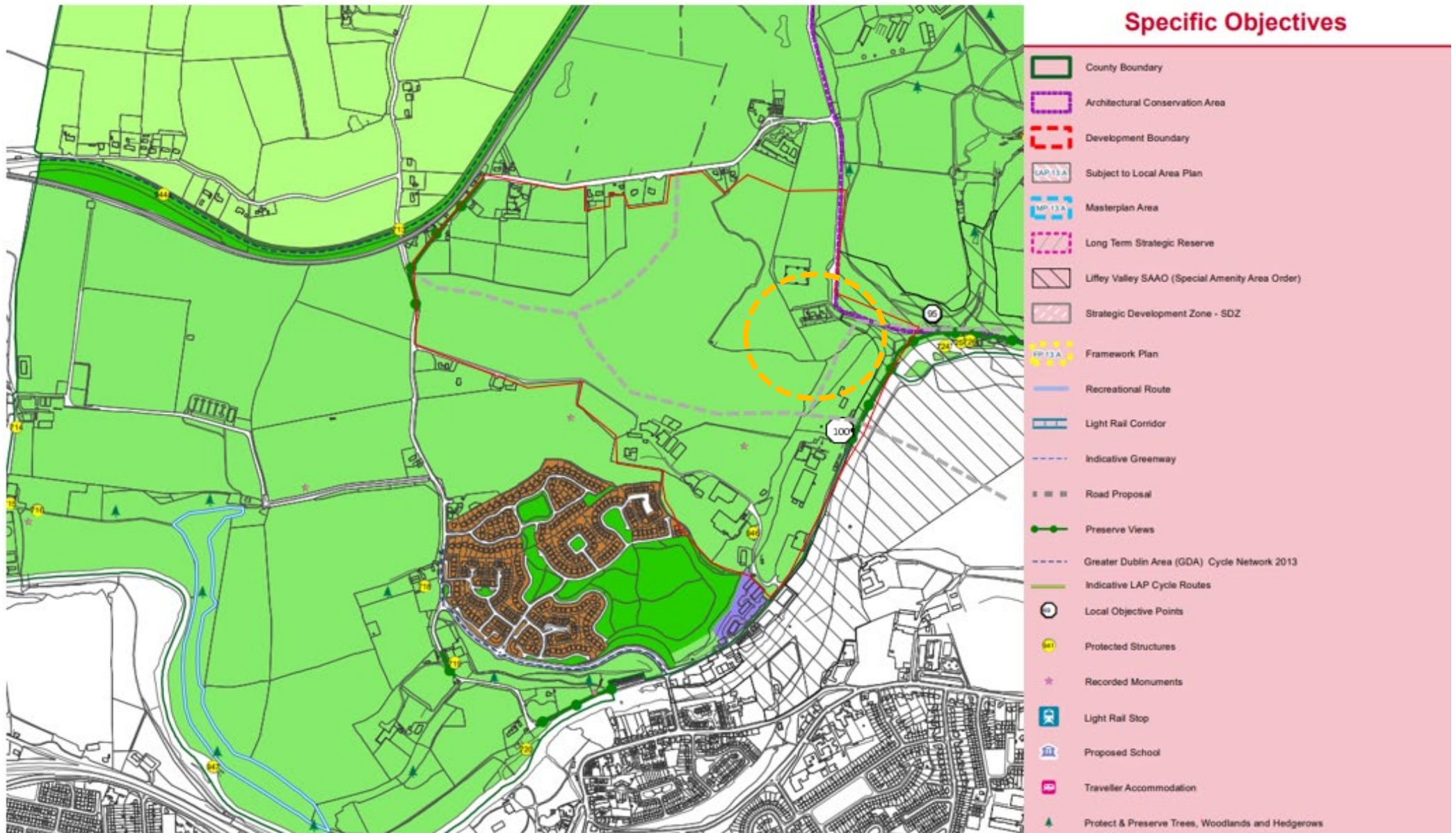


Figure 9 – Excerpt from Sheet 13 of the Draft Fingal County Development Plan (annotated by TPA) with subject lands outlined in red and illustrating proposed Mapped Objectives for the North Lucan area including road proposals & specific mapped objective 100 to provide for cross river link.

## 6. JUSTIFICATION FOR PROPOSALS

The suggested policy approach as outlined above, will in our view provide the following area wide benefits:

- The introduction of additional road connectivity will ease pressure on the existing road network in and around Lucan Village, as demonstrated in the accompanying report prepared by MHL and associates.
- The proposed transport objectives will enable the alignment of the movement policies of the various Planning Authorities in the area and will allow for additional linkages between the cycling objectives contained in the Greater Dublin Metropolitan Area Cycle Plan, North and South of the Liffey at this location.
- The proposals represent an enhanced planning policy arrangement for the existing employment and commercial uses on the southern portion of these lands and will allow for their continued orderly development.
- The proposals will enable the long held ambition of Creating a linear park providing wider connectivity to the Liffey Special Amenity Area and the nearby Shackleton's (Anna Liffey) Mills.

### 6.1 Policy context in the area should be updated to reflect existing uses

The High Amenity policy objective applied to the entire extent of the subject lands in both the existing and Draft Plans is not reflective of the existing uses in the southern and eastern portions of the subject lands. As outlined in Figure 2 a significant area of c. 19 hectares is currently occupied by employment uses within the wider land holdings. We consider that the Planning policy context in this area should be updated to provide a greater degree of certainty in relation to the future orderly development of the area. Areas adjacent to the River Liffey should in our view be designated as suitable for the development of a linear Park that can contribute to wider green infrastructure objectives. A consolidated employment zoning objective applied to the existing commercial uses and associated lands would help to ensure that the existing employment uses in this area can continue to develop and grown in a sustainable manner with adequate policy support.

We propose that the lands outlined in Figure 8 should have a zoning objective of GE – General Employment applied to them to provide opportunities for general enterprise and employment. The vision of the GE zoning objective is to:

*Facilitate opportunities for compatible industry and general employment uses, logistics and warehousing activity in a good quality physical environment. General Employment areas should be highly accessible, well designed, permeable and legible.*

The application of the above zoning objective would allow for a consolidation of existing employment lands in this area, which have to date developed in an unplanned manner. It would also provide a clear delineation between the existing employment and commercial uses





and lands to the north that are suitable for green infrastructure objectives associated with Shackleton Mills and the Liffey Valley SAAO. A targeted policy approach in this area will result in a revitalisation of the protected structure at the Mills with knock on benefits for the local economy.

The existing uses in the eastern portion of the lands include Chadwicks Hardware, CPI Euromix and MFP Plastics Limited. The current submission identifies an opportunity to re-allocate a portion of these lands and allow for the creation of a public amenity space in the north eastern portion. This would allow for connectivity into the adjacent Liffey Special Amenity Area and also creates the opportunity for continued development to the south and into Lucan Village. The amenity space could feasibly consist of a linear park and potentially an interpretive centre and associated car & bicycle parking facilities as part of a coordinated Shackleton Mills visitor experience.

The creation of an open space amenity area in this portion of the landholding will assist with the realisation of the zoning policy which seeks to reinforce character, distinctiveness and sense of place. The proposal also introduces the opportunity to increase public access to these lands and will assist with unlocking the amenity potential of Shackleton Mills.

## **6.2 Existing road infrastructure is inadequate**

The accompanying report prepared by MHL and Associates demonstrates that the local roads infrastructure is under strain and inadequate in many respects, including with regard to pedestrian and cycling infrastructure. The main findings of the report can be summarised as follows:

- The local road and street alignment and available road space is reflective of the historic layout and comprises of single lane carriageways, tight priority/signalised junctions, mini roundabouts. The available road space does not allow for the installation of cycle network infrastructure. Indeed the lack of cycle infrastructure in the wider Lucan area is particularly notable in the context of national modal shift trends and associated active travel infrastructure spend.
- The Lucan Bridge, a narrow stone arch bridge comprising of a c.6m carriageway and 1.5m wide footpaths, provides a crossing of the River Liffey and serves commuters and visitor over a wide area with commuters of Clonee, Ongar, Blanchardstown, Clonsilla, Castleknock connecting to Lucan, Adamstown and Clondalkin to the south via this bridge. TII Publications DN-GEO-03031 "Rural Road Link Design" suggest that such a carriageway cross section is appropriate to an Annual Average Daily Traffic (AADT) of 5,000 vehicles. However, recent traffic counts, procured as part of this study, point to an AADT of 17,000 vehicles crossing the Lucan Bridge in 2018.
- The area is poorly served by cycle infrastructure as shown in figure 2.6 below. Very limited cycleways are provided with some off road cycle tracks located along the Laraghcon link road, but not extending as far as St Catherine's Park. A lack of cycle connectivity between the urban centre and this park, and various other amenity facilities represents a very significant shortcoming in public infrastructure



- The high number of collisions in the vicinity of the Lucan Bridge points to significant road safety issues. The lack of pedestrian and cycle facilities (including appropriate road crossings) in the area represents a very significant road safety hazard.
- The Traffic modelling outlined in this report presents clearly that the existing road infrastructure is not capable of accommodating current traffic volumes. The traffic modelling of the junction south and north of the Lucan Bridge are shown to operate far in excess of their operational capacity in the current 2022 scenario, with a Level of Service “F” assigned to both AM and PM models. The inclusion of increased growth traffic volumes, to estimated 2029 traffic flows results in a further deterioration of these conditions.
- A potential road alignment and typical road sections have been prepared by POGA Consulting Engineers (Refer Appendix C MHL Report) detailing how the roads objective can be successfully delivered.

### **6.3 Amenity objectives can be achieved through a more targeted approach**

Notwithstanding their zoning designation as High Amenity, the majority of the subject lands are in agricultural use and are not publicly accessible as an amenity resource. Lands to the east and south are subject to existing light industrial, Commercial and other uses and are equally inconsistent with the zoning designation.

The creation of a riverside amenity park would be consistent with the High Amenity objective and the wider objective’s in the area such as the Liffey Valley Special Amenity Area to the east

We consider that the existing policy approach, which has been largely replicated in the Draft Plan, has to date failed to deliver on the amenity and open space objectives of the area.

The inclusion of the Roads objective and additional bridging point, creates the potential to achieve the mutual aims of both Fingal and South Dublin County Councils in terms of the unlocking the delivery of open space amenity areas, walking and cycling infrastructure and linear parks. The proposals would also allow for the full potential of the Anna Liffey (Shackleton) Mills to be unlocked for tourism and recreational purposes.

The north eastern portion of the lands provide a potential location to deliver on the existing objectives (GIM 10 and 95) to develop Anna Liffey Mills and provide for an associated car park. Additional complimentary land uses can be accommodated in this area to ensure the successful delivery of this local and tourism related amenity.

## **7. CONCLUSION**

We are requesting that Fingal County Council adopt a more targeted policy approach to the development of the identified lands at North Lucan in the upcoming Draft County Development Plan.

The policy proposal including potential roads objective outlined in this submission will:

- Provide a planning policy framework for existing commercial and employment areas that are currently designated as high amenity.



- Consolidate these employment areas to the south, allowing for the creation of a linear park along the banks of the River Liffey.
- Introduce policy support for the development of a distributor road through the subject lands and a second bridging point across the River Liffey. This will have the effect of
  - o Easing congestion in the Lucan Village area<sup>6</sup>.
  - o Providing an additional bridging point over the Liffey which will alleviate the existing bottlenecks at Lucan bridge, as identified in the accompanying MHL report. This proposal can also provide opportunities for new public transport routes.
  - o Incorporating pedestrian and cycling linkages that will contribute to meeting objectives in the Metropolitan Area Cycle Plan and County Development Plans of both Fingal and South Dublin
- The policy approach outlined in the submission will also assist with the delivery of the Green infrastructure and mapped local objectives of the area including development of a linear park along the banks of the Liffey as well as unlocking the potential of Anna Liffey (Shackleton) Mills as a tourism and local amenity.

We would welcome the opportunity to discuss this submission with you in due course.

Yours sincerely

---

**Bernard Dwyer**  
**Senior Planner**  
**Tom Phillips + Associates**

---

<sup>6</sup> <https://www.sdcc.ie/en/services/transport/villages-and-district-centres/lucan-village/>



---

**Appendix A - Road Infrastructure Report prepared by MHL Consulting Engineers**